

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TRUCKING ASSOCIATION OF NEW	:	
YORK,	:	CASE NO. 1:24-cv-04111 (LJL)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
METROPOLITAN TRANSPORTATION	:	
AUTHORITY, TRIBOROUGH BRIDGE	:	
AND TUNNEL AUTHORITY, LETITIA	:	
JAMES, in her capacity as Attorney General	:	
for the STATE OF NEW YORK,	X	
Defendants.		
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**MOTION OF UNITED PARCEL SERVICE, INC. FOR LEAVE TO FILE  
*AMICUS CURIAE* BRIEF IN SUPPORT OF PLAINTIFF**

*Amicus curiae* United Parcel Service, Inc. (“UPS”) respectfully moves for leave to file the attached brief in support of Plaintiff’s motion for a preliminary injunction.

UPS is the world’s largest package delivery company, transporting about 18 million packages and documents per business day throughout the US and to 220-plus countries. Its delivery operations use a fleet of more than 106,000 motor vehicles. In addition to package delivery, the company offers services such as logistics and freight forwarding through UPS Supply Chain Solutions, and less-than-truckload and truckload freight transportation through UPS Freight.

UPS conducts a significant amount of business in New York City, which counts as one of the company’s largest individual markets. UPS’s business in and around New York City would be substantially affected by New York’s Congestion Pricing Law. UPS believes that the proposed memorandum provides important information that would assist the Court in assessing Plaintiff’s

motion for a preliminary injunction, and specifically the merits of Plaintiff's challenge to New York's Congestion Pricing Law. *Trucking Association of New York v. Metropolitan Transportation Authority, et. al.*, Case: 1:24-cv-4111. Under these circumstances, UPS respectfully requests leave to file the attached brief.

Dated: New York, New York  
June 4, 2024

MORRISON & FOERSTER LLP

By: /s/ Jessica Kaufman

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